<u>IN THE DRAWINGS</u>

The attached sheets of drawings include changes to Figures 1-4, and a new Figure 6.

Figures 1-4 have been amended by translating the words therein to English, as required in the Office Action. (It is noted that the sheet for Figure 4 includes Figure 5, although Figure 5 is not being amended.)

Figure 6 is a new sheet which illustrates the action of the "expanding" and "collapsing" phrases that are described in the new paragraphs that have been inserted into the specification herein.

Applicant submits that no new matter has been added by the changes.

Attachments: Three (3) Replacement Sheets for Figures 1-5

One (1) New Sheet for Figure 6

<p style="text-align:center"><u>REMARKS</u></p>

<p style="text-align:center">Introduction</p>

Claims 1, 4-7, 16, 18, 22, 24-27, 37, 41-43, and 45 remain pending in this application, and have been amended. Claims 2, 3, 8-15, 17, 19-21, 23, 28-36, 38-40, and 44 have been canceled without prejudice or disclaimer of subject matter. Claims 1 and 22 are in independent form.

<p style="text-align:center">The rejection under 35 U.S.C. § 112, 1st paragraph</p>

Claims 3-7, 12, and 15-19 were rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the enablement requirement. The Examiner's reasoning is set out at paragraph 6 of the Office Action.

First, cancellation of claims 3, 12, 15, 17, and 19 renders their rejections moot.

Second, Applicant has the following remarks.

Remarks on paragraph 6 of the Office Action:

<u>Regarding claim 15:</u> this claim has been canceled, and its subject matter has been incorporated into claim 2.

<u>Regarding claim 16:</u> this claim has been clarified to still more clearly point out the how to handle text controls to create the escalator tree.

<u>Regarding claim 17:</u> this claim has been canceled.

<u>Regarding claim 18:</u> Applicant respectfully requests the Examiner to interpret this claim in light of the new versions of claims 15 and 16. In linguistics it is customary to mark phrases using delimiter characters such as brackets, as shown in Exhibit 2 in the patent

<p style="text-align:center">14</p>

application.

Applicant notes that one thing that is new and nonobvious in the present invention is to use different types of delimiter characters, so that one type (such as brackets) can be used to indicate a level change in the display, while other type (such as parentheses) can be used to mark a given phrase without showing it in a different level. This is described in detail in the published application at paragraphs 0228-0230.

<u>Regarding claim 19:</u> this claim has been canceled.

<u>Regarding claims 4-7:</u> please also see the remarks below.

For at least the foregoing reasons, withdrawal of the rejection under 35 U.S.C. § 112, 1st paragraph, is respectfully requested.

The rejection under 35 U.S.C. § 112, 2nd paragraph

Claims 1-21 were rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. The Examiner's reasoning is set out at paragraphs 3-5 of the Office Action.

First, cancellation of claims 2, 3, 8-15, 17, and 19-21 renders their rejections moot.

Second, the claims have been carefully reviewed and amended as deemed necessary to ensure that they conform fully to the requirements of Section 112, second paragraph, with special attention to the points raised at paragraphs 3-5 of the Office Action. Applicant also has the following remarks.

Remarks on paragraph 3 of the Office Action

<u>Regarding claim 1:</u> Applicant notes that the expressions "for example" and "can be" have been removed from the claims by the amendments presented herein.

Remarks on paragraph 4:

<u>Regarding claim 4:</u> Applicant respectfully points out that the function of identifying and selecting the "minimal chosen phrase" is explained in paragraphs 0111-0113 in the published application, i.e., US Patent Application Publication US 2007/0281286 A1. In order to make that description even more clear, the description is expanded here.

As is defined in the specification and in linguistics in general, phrases are basically groups of words. Therefore, once a given word is selected, from a linguistic point of view, it is easy to identify those phrases to which that given word belongs. Among those phrases, only one of them will contain no subordinate phrases. In this invention this phrase will be called "minimal".

Because among all the possible phrases that could be defined in the language fragment, the phrases that are chosen for the embodying the invention are called "chosen phrases", the minimal phrase will be called the "minimal chosen phrase".

Therefore, identifying the chosen minimal phrase is the process to finding out that phrase that contains the given word, and no other word.

Once the chosen minimal phrase is identified, "selecting" it is the same process that is used in all computer programs. This means to create an internal variable in the program that points to that element, and optionally marking the words of that phrase to graphically

emphasize it.

Regarding claim 5: As in tree structures, the "parent" of a given phrase is the phrase that contains that given phrase, and which does not contain any other phrase that contains that given phrase. The process of identifying and selecting the parent of a phrase is basically the same as the process followed to identify and select the minimal chosen phrase, previously described.

Regarding claim 6: "Expanding" and "collapsing" are terms that are customarily used in informatics in tree structures. However, the Applicant acknowledges that the representations used in this invention are not used in informatics. Applicant therefore explains further as follows.

In the new paragraphs inserted into the specification in page 5, it is stated that the organization of phrases is similar to a tree structure, wherein phrases are like the nodes of a tree. Even if special phrases are added which are not amenable to a tree structure configuration, most of the phrases usually are.

In conclusion, expanding and collapsing phrases is similar to expanding and collapsing nodes in a tree. This is explained in the new paragraphs inserted into the specification in page 6 (after paragraph 0120 of the published document).

In order to clarify this point, a paragraph has been inserted into the specification, and claim 6 has been reworded to explain "expanding" and "collapsing" in the context of the present invention.

Regarding claim 8: While claim 8 has been canceled herein, the Applicant would like to point out that the function "replacing words" is explained in paragraphs 0121-0133 of the published application. In the amended set of claims, the content of claim 8 has been clarified.

In order to maintaining the claim set ordered with a parent-child criterium, claim 8 has been canceled, and its content has been incorporated into claim 3.

Regarding claim 11:   While claim 11 has been canceled herein, the Applicant notes that claim 11 described a situation which is reverse to the one in claim 8. The whole process is described in paragraphs 0134-0151 of the published application.

Remarks on paragraph 5

Regarding claims 41, 42, 44, and 45: These claims have been amended such that they are now directed to a non-transitory computer-readable medium.

Regarding claims 43 and 46: These claims have been canceled, rendering their rejections moot.

It is believed that the rejection under Section 112, second paragraph, has been obviated, and its withdrawal is therefore respectfully requested.

For at least the foregoing reasons, withdrawal of the rejection under 35 U.S.C. § 112, 2nd paragraph, is respectfully requested.

The objection to the drawings

At paragraph 7 of the Office Action, the drawings were objected to because the drawings illustrations were not in English.

The attached sheets of drawings include changes to Figures 1-4. Figures 1-4 have been amended by translating the words therein to English, as required in the Office Action.

Applicant submits that no new matter has been added by the changes.

For at least the foregoing reasons, withdrawal of the objection to the drawings is

respectfully requested.

The rejection under 35 U.S.C. § 101

Claims 22-46 were rejected under 35 U.S.C. § 101 as being directed to non-statutory subject matter. The Examiner's reasoning is set out at paragraph 9 of the Office Action. Applicant has the following remarks.

Regarding claims 22-40: Claim 22 has been amended to tie the claimed method to a particular machine. The Applicant believes that this modification carries its effect forward to dependent claims 23-40.

Regarding claims 41, 42, 44, and 45: These claims have been amended such that they are directed to a non-transitory computer-readable medium, thereby, Applicant submits, making them statutory.

Regarding claims 43 and 46: These claims have been canceled herein.

For at least the foregoing reasons, withdrawal of the rejection under Section 101 is respectfully requested.

The rejections under 35 U.S.C. §§ 102/103

Claims 1-14 and 21-34 were rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,697,789 to Sameth.

Claims 15-20 and 35-39 were rejected under 35 U.S.C. § 103(a) as being obvious from Sameth in view of U.S. Patent No. 7,036,075 to Walker.

First, cancellation of claims 2, 3, 8-15, 17, 19-21, 23, 28-36, 38-40, and 44 renders their rejections moot.

Applicant submits that independent claims 1 and 22 as amended clearly distinguish over either Sameth or any combination of Sameth and Walker. Claim 1, for example, recites the following, *inter alia*: (a) a data store that contains at least one sample of the target language, (b) a processing unit with means to query the data store, and (c) means to present the language sample in a display by using graphical characters, and (d) means to adjust a vertical position of the graphical characters that correspond to a group of words which are located between two words of the language sample, the group of words being called an "internal phrase", so that the vertical position of the graphical characters that correspond to the words of the internal phrase is different from the vertical position that they would have had if the graphical character would have been presented in a standard word-by-word and line-by-line text arrangement, wherein applying the previous means to the words of a phrase is termed "increasing the presentation level" of the phrase, the graphical structure that is presented to the user in the display is termed "escalator structure", and the end result facilitates the comprehension of the structure of the language sample, facilitates the comprehension of the meaning of the language sample, and also facilitates learning the language when learning is sought by the user.

Applicant will now explain even more specifically why it is submitted that the claims are patentable over the cited references.

Applicant notes that an important modification is in claims 1 and 22. The purpose of this modification is to even more clearly point out the nonobvious nature of the invention with respect to the Sameth and Walker references.

This modification ties the invention to external phrases only. External phrases are defined in the paragraphs that are requested to be inserted in the specification. This definition points

to a subset of phrases.

The Walker reference folds the sentence at some points where there is a transition between phrases, and it affects all the words that follow from that point to the end of the sentence. However, in contrast, the current invention modifies the position of phrases between transition points, which also applies to in internal phrases.

This is a very important difference between Walker and the present invention. The Walker reference never folds the text for internal phrases. The result is that folding always increases the vertical position of graphical words when moving from the beginning to the end of the sentence. In a way, what the Walker reference does is similar to what is done in standard texts, where the text line is folded at the end of the page.

In contrast, in the present invention, by modifying the vertical position of internal phrases, the vertical position of graphical words will either increase or decrease, depending on what on what point on the sentence the words are.

The Applicant submits that modifying the vertical position for internal phrases is new and nonobvious. While modifying the vertical position for external phrases is very similar to what is customarily done in written texts, modifying the vertical position of internal phrases is very different.

There must be first a "fold down" of the text, and it is usually followed by a "fold up", where the vertical position of the text goes up again. This can be easily seen in Figure 1, where it can be observed how the text goes down and up depending on the phrase.

It is noted that Sameth, whether considered alone or in combination with Walker, would not teach or suggest all the features of claims 1 and 22 nor would it supply what is missing from Walker even if the two references were considered together.

Applicant has the following further remarks with respect to particular paragraphs of the Office Action.

Remarks on paragraph 11

Regarding claims 1 and 22: Claims 1 and 22 have been amended to more precisely point to the nonobvious nature of the invention.

Regarding claim 2: The former content of claim 2 has been deleted, and new content pointing to the nonobvious nature of the invention has been inserted. This has been done to keep the claim order in a way that more clearly shows the hierarchical relationship between claims.

Regarding claims 3 and 23: The former content of claim 3 has been deleted, and new content pointing to the nonobvious nature of the invention has been inserted. This has been done to keep the claim order in a way that more clearly shows the hierarchical relationship between claims. Claim 23 has been canceled.

Regarding claims 4 and 24: The Applicant submits that, especially when these claims are interpreted in light of the new base claims, they are new and nonobvious. However, the Applicant would like to respectfully point out that col. 2:15-25 of the Sameth reference does not refer to the minimal chosen phrase in the way it is referred to in the current application.

Regarding claims 5 and 25: The Applicant submits that, especially when these claims are interpreted in light of the new base claims, they are new and nonobvious. However, the Applicant would like to respectfully point out that col. 4:35-35 of the Sameth reference does not refer to the parent of the chosen phrase in the way it is referred to in the current application.

Regarding claims 6 and 26: The Applicant submits that, especially when these claims are interpreted in light of the new base claims, they are new and nonobvious. However, the Applicant would like to respectfully point out that col. 7:50-60 of the Sameth reference does not refer to collapsing and expanding in the way it is referred to in the current application.

Regarding claims 7 and 27: The Applicant submits that, especially when these claims are interpreted in light of the new base claims, they are new and nonobvious. However, the Applicant would like to respectfully point out that col. 8:20-25 of the Sameth reference does not refer to enabling and disabling phrases in the way it is referred to in the current application.

Regarding claims 8 and 28: The Applicant submits that, especially when these claims are interpreted in light of the new base claims, they are new and nonobvious. However, the Applicant would like to respectfully point out that the Sameth reference does not refer to replacing words in the way it is referred to in the current application. Claim 28 has been canceled.

Regarding claims 9 and 29: The Applicant submits that, especially when these claims are interpreted in light of the new base claims, they are new and nonobvious. Claim 29 has been canceled.

Regarding claims 10 and 30: The Applicant submits that, especially when these claims are interpreted in light of the new base claims, they are new and nonobvious. Claim 30 has been canceled.

Regarding claims 11 and 31: The Applicant submits that, especially when these claims are interpreted in light of the new base claims, they are new and nonobvious. However, the Applicant would like to respectfully point out that col. 6:40-45 of the Sameth reference does

not refer to replacing back words in the way it is referred to in the current application. Claim 31 has been canceled.

Regarding claims 12 and 32: These claims have been canceled.

Regarding claims 13 and 33: These claims have been canceled.

Regarding claims 14 and 34: These claims have been canceled.

Regarding claims 21 and 40: These claims have been canceled.

Regarding claims 41 and 46: The Applicant submits that, especially when these claims are interpreted in light of the new base claims, they are new and nonobvious. Claims 43 and 46 have been canceled.

Remarks on paragraph 13 (pages 8, 11)

Regarding claims 15 and 35: Claim 15 has been canceled, and its content has been reworded into claim 2. The Applicant believes that the new wording is new and nonobvious with respect to Sameth & Walker, for at least the foregoing reasons.

While Walker discloses repositioning a set of words into a different line, it always applies to external phrases (external words). It never discloses such repositioning being applied to internal phrases (internal words).

Walker repositioning is in a way very similar to the line wrapping that is done in printed text. Once the text reaches the extreme, it is folded and the new word is shown in the next line. Upon this background, Walker's innovation is where to fold the text and how to horizontally position it.

In the current invention, the nonobvious part comes from vertically repositioning internal words, which the Applicant believes is clearly nonobvious when compared to Walker and

standard texts.

Regarding claim 16: Claim 16 has been reworded to make the term "text control" more clear. What is referred to as "text control" are computer elements that are customarily used in computer programming. Examples of "text controls" are the TextBox in VisualBasic and Input element in HTML. These are computer objects which can be inserted in different positions in a display and which comprise internal functionality to manage text "out of the box".

In order to make this point still more clear, the new wording of claim 16 contains the term "computer text controls".

Regarding claims 17 and 36: Claims 17 and 36 have been canceled.

Regarding claims 18 and 37: Claim 18 has been amended to still more clearly point to the fact that different types of delimiter characters can be used, so that each type might have a different impact on the vertical displacement that is applied to the words delimited by it.

Regarding claims 19 and 38: Claims 19 and 38 have been canceled.

Regarding claims 20 and 39: Claims 20 and 39 have been canceled.

CONCLUSION

For at least the above reasons, the Applicant submits that the specification and claims are now in proper form, and that the claims define all define patentably over the prior art. Therefore they submit that this application is now in condition for allowance, which action they respectfully solicited.

Respectfully submitted,

/Raymond A. DiPerna/
Raymond A. DiPerna
c/o Ladas & Parry LLP
1040 Avenue of the Americas
New York, New York 10018-3738
Reg. No. 44063
Tel. No. (212) 708-1950